

EXHIBIT C

Fair Fight vs Raffensperger 30(b)(6) Lauren Groh-Wargo - Confidential

10/30/2019

1 UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION
4
5 FAIR FIGHT ACTION, et)
6 al.,)
7)
8 Plaintiffs,)
9)
10 vs.) CIVIL ACTION NO.
11) 1:18-CV-05391-SCJ
12 BRAD RAFFENSPERGER, in)
13 his official Capacity as)
14 Secretary of State of)
15 Georgia; et al.,)
16)
17 Defendants.)

18 THIS DEPOSITION CONTAINS INFORMATION DESIGNATED
19 CONFIDENTIAL SUBJECT TO PROTECTIVE ORDER

20 VIDEOTAPED DEPOSITION OF LAUREN GROH-WARGO

21 (Taken by Defendants)

22 October 30, 2019

23 10:10 a.m.

24 Suite 1650
25 1180 West Peachtree Street
Atlanta, Georgia

Reported by: Debra M. Druzisky, CCR-B-1848

1 along these lines on counteracting problems that
2 voters encountered in 2018. That was the rationale
3 for their creation.

4 Q. And this statement says that the past
5 effort included voter education. But now, would it
6 be correct to say you're having to educate voters
7 about something different because of the voter
8 suppression issues?

9 A. Yes.

10 Q. Okay.

11 A. It's what I described to you sort of on
12 that mail piece example. Like, there's some basic
13 amount of voter education that goes in on turn-out
14 activities. What we are now doing and thinking
15 about doing next year is way beyond that.

16 Q. And in the next sentence of Paragraph 12,
17 where it indicates that Fair Fight Action will
18 "engage in election reform efforts that are focused
19 specifically on counteracting problems voters
20 encountered in the 2018 election," what is that
21 referring to?

22 A. Let me read it again.

23 (Whereupon, the document was
24 reviewed by the witness.)

25 THE WITNESS: So those are some of

1 the things we're looking at. So the
2 Democracy Warriors, Fair Fight U, are
3 very specific discrete programs meant to
4 counteract the wrongdoing and deal with
5 these issues that we see in terms of the
6 right to vote in Georgia.

7 Other things we're looking at, like,
8 this weekend around a sort of hybrid
9 phone bank to voters who have elections
10 coming up, be it way beyond what we have
11 done in the past in terms of telling
12 people when and where to vote, we're also
13 having a conversation with them to make
14 sure they're checking their registration
15 status, know where they're to go for
16 help.

17 It's a whole additional part of that
18 conversation that would not have been
19 there before that's meant to address the
20 issues we've seen and the injury that
21 Georgia voters have suffered.

22 And then sort of all these T.B.D.
23 activities around this huge 300,000 purge
24 that we've just learned of, like, what
25 are we going to need to do around that

1 potentially next year in terms of making
2 sure that folks' absentee ballots are
3 properly processed in terms of all of
4 those sorts issues we've seen and
5 outlined in this complaint, what are the
6 kinds of things that we can do to try to
7 mitigate and improve the voting rights of
8 Georgians.

9 BY MR. TYSON:

10 Q. In Paragraph 13 it -- the complaint
11 indicates that the new activities are going to
12 require funds that it would divert from other
13 programs, "such as 'getting out the vote' drives
14 and providing voters with general information on
15 upcoming elections."

16 Are those the programs that you're going
17 to divert resources from? Because I believe I
18 heard you describe some progressive policy programs
19 instead.

20 A. So as a baseline, if we can may -- wave a
21 magic wand and all these issues we've seen in the
22 state, we would be doing very typical "get out the
23 vote" activities as an organization.

24 We would be looking at, you know, what
25 phone banks do we want to do, what text banks do we